

CommSpeed
7411 E. Addis Ave.
Prescott Valley, AZ 86314

Federal Communications Commission
445 12th Street SW
Washington, DC 20554

April 22, 2002

To Whom It May Concern,

I have read your NPRM for rules levying USF fees for Wireless Broadband providers. (Proceedings 02-33). These fees do nothing more than feed the monopoly that caused companies such as CommSpeed to begin providing economical high-speed wireless internet business in the first place.

In Northern Arizona, Qwest has done a very mediocre job at best, in providing Internet access to spotty areas and have forced innovative operators like CommSpeed to install wireless delivery systems to provide service to significant areas of the state.

The large ILECs take the universal service funds and pad their bottom line. They are very non-responsive to providing high speed access in rural areas. This is what the USF was created for and should be used for. The USF funds are being put into the ILECs treasury with little or no return on these funds to the areas that are demanding it.

Forcing the small WiFi carriers to charge these USF fees seems quite obtuse since we will never see any of these funds to expand our wireless networks. Wireless networks, by the way, are the only type of high-speed access available in the vast majority of our state.

We're very concerned about the bookkeeping and regulatory requirements that would have to be borne by us. We also feel that the financial burdens will hurt the groups that the USF was intended to help. CommSpeed has invested millions of dollars in our network, without one stitch of Federal assistance.

The FCC should take heed of these issues and take steps to protect the groups actually working to foster the FCC's original, desired outcome. Any new regulatory or fee burdens, no matter what public service these attempted to serve, are squarely against the intent of the Universal Service Fund and should not be levied against WiFi providers. I strongly urge you to reconsider.

Sincerely,
Mark Davis
General Manager
CommSpeed